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Before the
Federal Communications Commission
Washington, DC

JUN 18 1993

In the Matter of

Review of the Commission's
Rules Governing the Low Power
Television Service

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MM Docket No. 93-114
RM-7772

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To: The Commission - Mail Stop 1170

COMMENTS OF W43AG, Hopkinsville, KY

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

W43AG a low power television station in Hopkinsville, Kentucky, wishes to enter these comments in response to the Commission's Notice of Proposed Rulemaking, FCC 93-187.

W43AG, having been licensed since 1982, is thoroughly conversant with the issues raised in the Notice.

W43AG supports the concept of dropping the letter perfect standard. The landslide of applications is over. The Commission's

has come" to relax the letter perfect standard.

W43AG also supports the Commission's proposal to allow reliance on terrain shielding in more circumstances than "singleton" applications.

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W43AG also supports the relaxation of the "**major** change" definition. It will allow additional service to the viewing public to the detriment of no one. It will also greatly expedite the construction of many stations, a long-time commission goal. This proposal, when considered coincidental with the "letter **perfect**" standard, further reduces the Commission's administrative burden, as many of the changes that formally had to be handled as a major change, and thus be processed at a window, can now be handled on an "**as** needed" basis, thus freeing manpower for new application processing in the windows. This proposal will benefit operators, the viewing public, and the Commission's administrative processes.

W43AG supports the proposed definitional change, which would allow a station's service area to be expanded up to a circle the diameter of which is the reach of the station's largest directional lobe, as a minor change. We would propose that the Commission consider giving stations some additional flexibility, by allowing stations to extend their contour in any direction up to ten percent, or a set distance such as five miles, and still treat it as a minor change.

The instances of this happening should not be great, as the power limitations on the station's transmitter would still apply, and the additional contour would still have to meet the Commission's interference standards with regard to both full power and low power stations. This would be done

on an **"as** needed" basis, again, leaving the bureau's resources to work substantially on new applications following filing windows.

The Commission's proposal to allow LPTV stations to apply for and use four letter call signs is far too long in coming, and **W43AG** enthusiastically supports it.

We could fill a book with the problems our current five letter calls have caused us in our ten years on the air. Many have been widely recounted; they don't fit in rating diaries or ad agency computers. The public doesn't recognize them as being a **"real"** TV station. Ad infinitum.

Simply put, strange call letters brand our stations as strange and different. Bastards at the family reunion. It creates instant confusion and suspicion, but accomplishes absolutely nothing.

When the Low Power Television Service was started, LPTV stations were glorified translators. All a translator had to do to become a low power station was send in a letter to the Commission. They didn't even have to generate any local programming. So the Commission, for simplicity of its administrative handling of LPTV and translators, simply gave LPTV stations translator call signs.

However, over the last ten years, LPTV has come of age, including Congressional recognition via must carry in certain circumstances. It is now time to change its name to better reflect its true role.

Although our detractors constantly try to sell LPTV as a "secondary **service**" across the board, LPTV stations are secondary ONLY in the area of spectrum allocation. To continue to treat them as step children in any other way is contrary to the public interest. This includes call letters.

One part of the Commission's proposal dealt with a suffix such as LP to differentiate LPTV from "**other**" stations. Why do you want to differentiate us? We know why our detractors want to, but that is NOT the Commission's concern. The Commission does not require Class A FM stations to use a suffix of "**CA**" after their calls. You do not require daytime only stations to use a suffix "**DA**" after their calls. You do not require UHF or VHF stations to differentiate themselves from each other by using a suffix. Educational stations are not required to put "**ED**" after their calls. Why must low power television continue to be discriminated against?

If our competitors in the television industry are so concerned about our stations being "**labeled**" differently than theirs, then **let's** be fair. Let's put some sort of suffix after their call letters also. Perhaps "**FP**" for full power. Or maybe "**BB**" for big broadcaster. Or maybe even "**BS**" for

big station. The opposition to four letter calls perpetuated by our competitors is actually the ultimate compliment to the success of the LPTV service and is thus our "proof of **performance**" that we have earned the right to be labeled as television stations JUST LIKE THEY ARE, rather than as translators, which we are NOT.

In the case of **W43AG**, our list of over 20 major state and national awards. puts us on a par with many, and ahead of some full power stations. Power is not the issue. (Don't forget, CNN has only a half watt.) The issue is a level playing field. Equity. There is NO REASON Low power television stations should not be given the same four letter calls as every other commercial radio and television broadcaster. LPTV stations should also be able to use a six letter call, with the last two letters being "TV", in order to use the same call letters for the first four digits as a radio station, of course, with that station's permission.

The commission should also consider requiring that a low power station originate programming in order to receive four letter calls. To allow a translator operating as a translator but licensed as a low power station to use four letter calls could create some confusion. Many stations currently using translators give the translator's call signs periodically. It would be confusing to the viewers, especially considering the ratings diaries, to hear a station say, **"This** is WXYZ, plus translators WXYA, WCBL, WRKN, WBBS,

etc." Viewers wouldn't know which station they were watching, nor which one to put down in their diary. Assigning four letter calls to LPTV stations would also automatically delineate between a television station (full power OR low power) and a translator.

W43AG, hopefully soon to become W - - - appreciates the Commission's attention to all of these matters dealing with the low power television service. These changes will go a long way toward securing the future of this fledgling industry.

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WESTERN KENTUCKY'S AWARD-WINNING NEWS STATION

TWENTY-FIVE MAJOR STATE AND NATIONAL AWARDS IN SEVEN YEARS

**1992 - COMMUNITY BROADCASTERS ASSOCIATION
NATIONAL AWARD
STATION OF THE YEAR**

**1992 - KENTUCKY BROADCASTERS ASSOCIATION
BEST LOCALLY PRODUCED COMMERCIAL
NAUTILUS FITNESS CENTER**

**1992 - KENTUCKY BROADCASTERS ASSOCIATION
MERITORIOUS SERVICE AWARD
CONTRIBUTIONS TO INDUSTRY**

**1991 - COMMUNITY BROADCASTERS ASSOCIATION
BEST PROMOTIONAL CAMPAIGN**

**1991 - COMMUNITY BROADCASTERS ASSOCIATION
NATIONAL AWARD
BEST 5 PM NEWSCAST**

**1991 - KENTUCKY BROADCASTERS ASSOCIATION
MERITORIOUS SERVICE AWARD
OVERALL PROGRAMMING AND COMMUNITY INVOLVEMENT**

**1991 - ASSOCIATED PRESS
BREAKING SPOT STORY
TOLL BOOTH FATALITIES**

**1991 - ASSOCIATED PRESS
HUMAN INTEREST CATEGORY
FIFTH SPECIAL FORCES**

**1991 - ASSOCIATED PRESS
FEATURE INTEREST CATEGORY
EVERLY BROTHERS RETURN HOME**

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**FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY**

**1990 - COMMUNITY BROADCASTERS ASSOCIATION
NATIONAL AWARD
BEST 5 PM NEWSCAST**

**1990 - COMMUNITY BROADCASTERS ASSOCIATION
NATIONAL AWARD
BEST 6 PM NEWSCAST**

**1990 - ASSOCIATED PRESS
BEST SPORTS PROGRAM
LOCAL TEAM WINNING STATE CHAMPIONSHIP**

**1989 - COMMUNITY BROADCASTERS ASSOCIATION
NATIONAL AWARD
BEST LOCAL PRODUCTION OF A COMMERCIAL**

**1989 - COMMUNITY BROADCASTERS ASSOCIATION
NATIONAL AWARD
BEST NEWSCAST**

**1989 - UNITED STATES ARMY
COMMANDING GENERAL, FT. CAMPBELL, KY.
COVERAGE OF FORT CAMPBELL ACTIVITIES**

**1989 - ASSOCIATED PRESS
BEST NEWS SERIES
LOCAL DRUG USE**

**1989 - CRIMESTOPPERS INTERNATIONAL
NATIONWIDE AWARD
BEST RE-ENACTMENT IN MARKET SIZE**

**1989 - KENTUCKY BROADCASTERS ASSOCIATION
SPECIAL AWARD
COMMUNITY SERVICE AND INVOLVEMENT**

**1988 - UNITED STATES ARMY
COMMANDING GENERAL, FT. CAMPBELL, KY.
COVERAGE OF OPERATION DESERT HAMMER**

**1988 - ASSOCIATED PRESS
BEST BREAKING SPOT NEWS COVERAGE
FT. CAMPBELL CRASH OF TWO BLACK HAWK HELICOPTERS**

**1987 - UNITED STATES ARMY
COMMANDING GENERAL, FT. CAMPBELL, KY.
SERVICE TO MILITARY COMMUNITY**

1987 - ASSOCIATED PRESS
BEST NEWS SERIES
LOCAL DRUG USE

1987 - TELEVISION BROADCAST MAGAZINE
COMMUNITY SERVICE AWARD
LOCAL PROGRAMMING INVOLVEMENT

1986 - KENTUCKY PARKS AND RECREATION SOCIETY
STATEWIDE FIRST PLACE AWARD
COVERAGE OF LOCAL RECREATION DEPARTMENT EVENTS

1986 - ASSOCIATED PRESS
BEST SPOT NEWS COVERAGE
GANDER CRASH OF PLANE BOUND FOR FT. CAMPBELL, KY.

1986 - ASSOCIATED PRESS
BEST COVERAGE OF A BREAKING STORY
GANDER CRASH OF PLANE BOUND FOR FT. CAMPBELL, KY.
